

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
EASTERN DIVISION

Civil No. 3:23- cv-00019

CHARLEE LANG; GREGORY LANG on )  
behalf of minor daughter J.L., )

Plaintiffs, )

vs. )

OAK GROVE LUTHERAN SCHOOL, )  
through its Board of Regents; DANIEL STOA, )  
in his official and individual capacity; )  
MICHAEL SLETTE, in his official and )  
individual capacity; BRENT WOLF, in his )  
official and individual capacity; AMIEE )  
ZACHIRSON, in her official and individual )  
capacity, )

Defendants. )

**DEFENDANTS OAK GROVE  
LUTHERAN SCHOOL, MICHAEL  
SLETTE, BRENT WOLF AND AIMEE  
ZACHRISON’S MOTION FOR TIME  
EXTENSION ON RESPONSE TO  
PLAINTIFFS’ AMENDED COMPLAINT  
AND REQUEST FOR EXPEDITED  
DECISION**

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[¶ 1] Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and other applicable law, Defendants Oak Grove Lutheran School, Michael Slette, Brent Wolf, and Aimee Zachrison (collectively “Oak Grove Defendants”), request the Court extend their current May 31, 2023 deadline to respond to Plaintiffs’ Amended Complaint (doc. 28) to June 14, 2023.

[¶ 2] Good cause exists for the requested extension of time. Oak Grove Defendants intend to file a Rule 12(b)(6) motion requesting dismissal of the Amended Complaint for failure to state a claim. The attorney principally responsible for briefing in this case, Shawn Grinolds, would have considerable difficulty completing the Rule 12 brief in a timely manner without the requested extension due to other work commitments including a trust petition, deposition preparation session and deposition.

[¶ 3] Plaintiffs’ counsel has informed the undersigned that Plaintiffs do not object to

this requested time extension.

[¶ 4] As the current deadline for the Oak Grove Defendants' to respond to Plaintiffs' Amended Complaint is May 31, 2023, **Oak Grove Defendants request an expedited decision on this motion.**

[¶ 5] For the foregoing reasons, Oak Grove Defendants request the Court to extend the deadline for their response to Plaintiff's Amended Complaint to June 14, 2023.

Dated the 26th day of May, 2023.

BAKKE GRINOLDS WIEDERHOLT

By: /s/ Shawn A. Grinolds  
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Attorney for Oak Grove Lutheran School,  
Michael Slette, Brent Wolf and Aimee  
Zachrison

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **DEFENDANTS OAK GROVE LUTHERAN SCHOOL, MICHAEL SLETTE, BRENT WOLF AND AIMEE ZACHRISON'S MOTION FOR TIME EXTENSION ON RESPONSE TO PLAINTIFFS' AMENDED COMPLAINT AND REQUEST FOR EXPEDITED DECISION** was on the 26<sup>th</sup> day of May, 2023, was filed electronically with the Clerk of Court through ECF.

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By: /s/ Shawn A. Grinolds  
SHAWN A. GRINOLDS